

1 PARSONS BEHLE & LATIMER

2 Michael R. Kealy (Nevada Bar No. 0971)
3 50 West Liberty Street, Suite 750
4 Reno, NV 89501
Telephone: (775) 323-1601
Facsimile: (775) 348-7250

5 Francis M. Wikstrom (Utah Bar No. 3462; admitted *pro hac vice*)
6 Michael P. Petrogeorge (Utah Bar No. 8870; admitted *pro hac vice*)
7 Brandon J. Mark (Utah Bar No. 10439; admitted *pro hac vice*)
One Utah Center
8 201 South Main Street, Suite 1800
Salt Lake City, UT 84111
9 Telephone: (801) 536-6700
Facsimile: (801) 536-6111
10 Email: ecf@parsonsbehle.com

11 *Attorneys for Barrick Goldstrike Mines Inc.*

12
13 IN THE UNITED STATES DISTRICT COURT

14 FOR THE DISTRICT OF NEVADA

15
16 BULLION MONARCH MINING INC.,

17 Plaintiff,

18 vs.

19 BARRICK GOLDSTRIKE MINES INC.,

20 Defendant.

21 Case No. 03:09-cv-612- MMD-WGC
(Sub File of 3:08-cv-227- MMD-WGC)

22 **RENEWED STIPULATED
MOTION TO EXTEND
DEADLINE ON BARRICK
GOLDSTRIKE MINES INC.’S
REPLY IN SUPPORT OF
RENEWED MOTION TO
DISMISS FOR LACK OF
JURISDICTION (FIRST
REQUEST)**

23
24 Barrick Goldstrike Mines Inc. (“Goldstrike”), by and through undersigned
25 counsel, moves this Court for an order extending the deadline on its reply in support of
26 its Renewed Motion to Dismiss for Lack of Jurisdiction [Doc. 281] (the “Renewed
27 Motion”). The Renewed Motion was filed by Goldstrike on April 20, 2018. Bullion
28

1 Monarch Mining, Inc. (“Bullion”) filed its opposition under seal on May 11, 2018.
2 Goldstrike seeks to extend the deadline by four days, from Monday, May 21, 2018, to
3 Friday, May 25, 2018. Although the overall briefing schedule for the Renewed Motion
4 was revised once before in order to accommodate the delivery of deposition transcripts
5 (*see Order Granting ECF No. 279 Joint and Stipulated Motion to Revise Briefing*
6 *Schedule for Goldstrike’s Motion to Dismiss [Doc. 280]*), this is the first request to
7 extend the deadline on Goldstrike’s reply.¹

8 The four-day extension on Goldstrike’s reply is requested for two reasons. First,
9 Bullion Monarch Mining, Inc.’s (“Bullion”) opposition to the Renewed Motion was
10 timely filed on Friday, May 11, 2018, but Goldstrike did not obtain an
11 unsealed/unredacted copy of Bullion’s opposition until Monday, May 14, 2018. Second,
12 while counsel for Goldstrike has worked diligently throughout the week to draft the
13 reply, the draft is being internally reviewed and edited and counsel wants to ensure that
14 the client has adequate time to review, comment on and approve the reply prior to filing.

15 Counsel for Bullion stipulates to and does not oppose this motion.

16 Dated: May 18, 2018

17 PARSONS BEHLE & LATIMER

18
19 By: /s/ Michael P. Petrogeorge
20 Francis Wikstrom, Esq.
21 Michael Kealy, Esq.
22 Michael P. Petrogeorge, Esq.
23 Brandon J. Mark, Esq.
24 *Attorneys for Defendant*
25 *Barrick Goldstrike Mines Inc.*

26
27 ¹ Goldstrike filed its first motion to extend the deadline on the reply on May 17, 2018 [Doc. 293]. The
28 Court denied that motion on May 18, 2018, because it did not fully comply with LR IA 6-2 [Doc. 294].
Goldstrike therefore refiles the motion to comply with LR IA 6-2.

1 Stipulated and agreed to this 18th day of May, 2018

2 LEWIS & ROCA LLC

3 By: /s/ Joel D. Henriod (with permission via email)

4 Daniel F. Polsenberg

5 Joel D. Henriod

6 Abraham G. Smith

7 Thomas L. Belaustegui

8 Kent R. Robinson

9 Clayton P. Brust

10 ROBINSON, SHARP, SULLIVAN & BRUST

11 *Attorneys for Bullion Monarch Mining, Inc.*

12 *IT IS SO ORDERED:*

13 MIRANDA M. DU

14 UNITED STATES DISTRICT JUDGE

15 DATED: May 18, 2018

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that on this 18th day of May, 2018, I filed the foregoing **RENEWED**
4 **STIPULATED MOTION TO EXTEND DEADLINE ON BARRICK GOLDSTRIKE**
5 **MINES INC.'S REPLY IN SUPPORT OF RENEWED MOTION TO DISMISS FOR**
6 **LACK OF JURISDICTION** with the Court using the CM/ECF system, which caused electronic
7 service to be made on the following:

8 Clayton P. Brust
9 Robinson, Sharp, Sullivan & Brust
10 71 Washington Street
11 Reno, Nevada 89503
12 cbrust@rbsllaw.com

13 Daniel F. Polsenberg
14 Joel D. Henriod
15 Abraham G. Smith
16 Lewis Roca Rothgerber, LLP.
17 3993 Howard Hughes Pkwy, Ste. 600
18 Las Vegas, NV 89169
19 jhenriod@lrrlaw.com

20 16 /s/ Michael P. Petrogeorge
21
22
23
24
25
26
27
28